

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

Metropolitan Transportation Authority, *et al.*,

Plaintiffs,

v.

Blue Cross and Blue Shield of Alabama, *et al.*,

Defendants.

No. 2:22-cv-00265-RDP

JOINT STIPULATION REGARDING FILING OF AMENDED COMPLAINT

Plaintiffs and Defendants in the above-captioned action (together, the “Parties”), by and through their undersigned counsel and pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), hereby agree to entry of an Order extending the time for Plaintiffs to file an amended complaint in this Action. Because there is good cause for the requested extension, the Court should enter this Joint Stipulation Regarding Filing of Amended Complaint. In further support, the Parties state:

WHEREAS, on October 11, 2022, all Defendants filed a motion to dismiss (Dkt. 97) and certain Defendants filed a motion to dismiss challenging personal jurisdiction and venue (Dkts. 71, 84);

WHEREAS, on October 12, 2022, the Court entered an Initial Order requiring the Parties to confer pursuant to Federal Rule of Civil Procedure 26(f) by November 11, 2022;

WHEREAS, on October 21, 2022, the Parties filed a Joint Stipulation Regarding Briefing Schedule regarding the pending motions to dismiss (Dkt. 121), which provided that

Plaintiffs would respond to the motions to dismiss by November 18, 2022, and which the Court ordered (Dkt. 124);

WHEREAS, Plaintiffs intend to amend their Complaint rather than respond to Defendants' motions to dismiss;

WHEREAS, pursuant to Federal Rule of Civil Procedure 15(a)(1)(B), Plaintiffs may amend their Complaint as a matter of course on or before November 1, 2022; and

WHEREAS, the Parties have met and conferred and reached agreement regarding an extension of the deadline by which Plaintiffs may amend their Complaint, and the schedule for submissions in response to that pleading;

IT IS HEREBY STIPULATED AND AGREED by and among the undersigned Parties that:

1. Plaintiffs shall file an amended complaint by December 1, 2022.
2. Defendants' deadline to answer or otherwise respond to Plaintiffs' amended Complaint shall be January 20, 2023.
3. The Parties shall meet and confer regarding other scheduling issues, including the scheduling of a Rule 26(f) conference, after Plaintiffs file their amended complaint.

Dated: November 1, 2022

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SO ORDERED this ____ day of November, 2022.

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